

CAP 3164 Economic Regulation of NERL – response to Consultation

From: St. Albans Aircraft Noise Defence (“STAND”)

STAND represents residents of historic St. Albans, Hertfordshire affected by aircraft overflight. Decisions about airspace design have a direct, ongoing impact on noise exposure, health and wellbeing.

For that reason, we consider ourselves stakeholders in the regulatory framework proposed in CAP 3164, which determines how airspace design decisions will be developed, governed and scrutinised.

CAP 3164 aims to enable timely and efficient airspace modernisation by establishing the Airspace Design Service (ADS). We support that objective provided it delivers the necessary focus on local issues, specifically in our case departures from the local airport being held low due to overflight from others.

However, we are concerned that the proposed licence framework increases the risk of delay, dispute and loss of confidence, rather than reducing it, by placing too much reliance on high-level obligations, internal guidance, deferred accountability, and limited enforceable transparency.

In our view, this approach may undermine the very delivery objectives the proposals seek to achieve.

Request for reconsideration

To reduce delivery risk and build durable confidence, we ask the CAA to:-

1. Place clearer, enforceable transparency obligations in the licence itself.
2. Require early and meaningful engagement with affected communities before designs are effectively fixed.
3. Strengthen governance so that stakeholder concerns are demonstrably considered and addressed.
4. Apply disclosure obligations equivalent to the Freedom of Information Act on ADS activities.

Yours sincerely,

John Verulam

Secretary, STAND